



Clean Air Markets Division

Electronic Data Report Review Process

Each quarter, and during the ozone season, sources affected by the Acid Rain and/or NO_x Budget Programs submit electronic data reports for their affected units to the EPA no later than 30 days following the end of each calendar quarter. Each report must be signed and certified for accuracy and completeness by the source's Designated Representative (DR) or Alternate Designated Representative (ADR) for the Acid Rain Program, or the Authorized Account Representative (AAR) or Alternate Authorized Account Representative (AAAR) for the NO_x Budget Program. This document describes the process EPA uses to evaluate each electronic data report and determine the accepted emissions value for each affected source. These final data are used for allowance reconciliation and compliance determination and are made available to the public.

The "EPA Accepted" values used for the purpose of annual or ozone season reconciliation are based on the calculated daily or hourly values submitted in each electronic data report. These values are represented by the "EPA Accepted" column of the cumulative data summary table contained in each Emission Tracking System (ETS) feedback report. This table is generated for each stack/unit/pipe ID identified in the electronic data report. An example of the cumulative data summary table is included at the end of this document.

All electronic data reports submitted to the EPA are sent directly to ETS, which performs automated data processing. The electronic data reports are required to be electronically submitted directly to EPA using ETS-FTP, an EPA-developed software program.

The EPA's Electronic Data Report Review Process consists of the following three steps:

- 1. Data Review** - All electronic data reports are analyzed in a two-step process to detect deficiencies and identify reports that must be resubmitted to correct problems. The first step of the analysis includes rejection criteria, critical error rejection and informational error reviews, performed through ETS, as well as electronic data report audits performed outside of ETS. The second step of the process includes analysis performed with the Monitoring Data Checking (MDC) software, as well as audits performed independently of MDC and field audits. The EPA also identifies reports that were not submitted by the appropriate reporting deadline.
- 2. Data Resubmission** - Revised electronic data reports must be obtained from sources by a specified deadline to correct deficiencies found during the Data Review process.
- 3. Data Dissemination** - All data are reviewed, and preliminary and final emissions data reports are prepared for public release and compliance determination.

These three primary activities are described below in further detail:

1. Data Review

ETS Electronic Data Report Review Process

The first step in the Electronic Data Report Review Process includes rejection criteria, critical error rejection and informational error reviews, performed through ETS, as well as electronic data report audits performed outside of ETS. This process is described below.

A) Automated Quarterly Report Review

All electronic data reports submitted to ETS on the EPA mainframe are reviewed by the ETS software and are analyzed for deficiencies. The ETS software provides an “instant” feedback report for each electronic data report indicating the results of the analysis and identifying any detected deficiencies. The criteria used in this automated review are briefly described below:

Rejection Criteria Review - All electronic data reports submitted to ETS on the EPA mainframe are first tested against automated rejection criteria. These criteria determine whether an electronic data report is basically complete and internally consistent according to a specific program’s reporting requirements, including the ordered record types (RT) described in the Electronic Data Reporting (EDR) format, version 2.1 or 2.2. The EPA will reject a report if it meets any of the rejection criteria, and will inform the source that the electronic data report must be corrected and resubmitted. ETS assigns a Status Code of 6 to a rejected report. For a document listing ETS errors that generate a Status Code of 6 see: “Active ETS Error Codes/Messages” at <http://www.epa.gov/airmarkets/reporting/index.html>.

Sources who submit the electronic data report receive the results from this automated review in their ETS feedback report. ETS generates error text messages to describe the rejection errors detected in the report. If a report is rejected (Status Code 6), the feedback states that the source must correct and resubmit the report to the EPA by the submission deadline (see Section 2. Data Resubmission). During the specified electronic data report submission period (30 days after a calendar quarter), the source has the option of submitting a file numerous times before the submission deadline. A report that passes the automated rejection criteria will next undergo an automated critical error review, described below.

Critical Error Rejection Review - Each electronic data report that passes the automated rejection criteria then undergoes a second level of automated ETS software checks to detect critical errors. While the Rejection Criteria Review reviews each electronic data report for completeness, the Critical Error Rejection Review analyzes the hourly emissions data and its supporting data within the electronic data report. Sources who submit the electronic data report receive the results from this automated critical error rejection review in their ETS feedback. A report that fails any one of these checks is assigned a “Critical Error Rejection” status (Status Code 5) within ETS. ETS generates error text messages to describe the critical rejection errors detected in the electronic data report. If an electronic data report receives a critical error rejection (Status Code 5), the feedback states that the source must correct and resubmit the electronic data report to the EPA by the submission deadline (see Section 2. Data Resubmission). For a document listing ETS errors that generate a Status Code of 5 see: “Active ETS Error Codes/Messages” at <http://www.epa.gov/airmarkets/reporting/index.html>.

Informational Error Review - After the critical error rejection review, the electronic data report then undergoes a final level of ETS software checks to detect other types of errors and inconsistencies called informational errors. Results from this final analysis are also included in the ETS feedback. ETS generates error text messages to describe the informational errors (if any) detected in the report and assigns a “Quarterly Report Contains Informational Errors” status (Status Code 9). The electronic data report may then be revised to correct informational errors and resubmitted to the EPA prior to the submission deadline. Informational errors should be corrected so they do not occur in subsequent quarterly reports. For a document listing ETS errors that generate a Status Code of 9 see: “Active ETS Error Codes/Messages” at <http://www.epa.gov/airmarkets/reporting/index.html>.

As part of ongoing Quality Assurance (QA) activities, the EPA expects to incorporate certain informational errors into the set of critical error rejection criteria (Status Code 5) or in some limited

cases, incorporate an informational error into the set of rejection criteria (Status Code 6). In other words, errors which are currently identified by ETS for the source to correct in future submissions (Status Code 9 - Informational Errors) may become errors which the source must correct before the electronic data report containing the specified error(s) can be accepted by the EPA.

- B) Additional Quarterly Report Audits - In addition to the automated electronic data report reviews described above, the data is reviewed using criteria selected by EPA on a quarter by quarter basis. For example, EPA may select for resubmittal electronic data reports having invalid number of record type 300s, no hourly heat input reported in record type 300, incomplete or invalid Acid Rain Program certification record(s). The outcome of this review may result in a determination by EPA that certain electronic data reports should be resubmitted. If this happens, the source will be contacted by the EPA requesting that the electronic data report be resubmitted.

The Monitoring Electronic Data Review Process

The second step in reviewing each electronic data report includes analyses performed with MDC, as well as audits performed independently of MDC and field audits.

MDC Electronic Data Report Review

A) MDC Monitoring Plan and Quality Assurance Test Data Evaluation - In addition to the ETS electronic data report review process described above, the EPA will provide MDC feedback on the monitoring plan and quality assurance test data included on each electronic data report. Once the electronic data report has been accepted by ETS, the electronic data monitoring plan and quality assurance information are evaluated using the latest version of MDC software. This portion of the MDC evaluation identifies critical and informational errors in the monitoring plan and quality assurance tests. A list of the critical errors can be found at <http://www.epa.gov/airmarkets/monitoring/mdc/mdc-qr-critical-errors-table.pdf>. The MDC software package can be obtained from our website at <http://www.epa.gov/airmarkets/monitoring/mdc/index.html>. All of the specifications for MDC checks can be found by browsing on the Help menu. EPA will send via E-mail MDC Monitoring Plan and Quality Assurance Test Data Evaluation feedback following the close of the submission period and after each resubmittal. The electronic data report must be resubmitted to correct any critical errors.

B) MDC Hourly Evaluation - In addition to the MDC feedback on monitoring plan and quality assurance test data evaluation, more extensive quality assurance and hourly emissions data checks are performed using the hourly data evaluation feature of the MDC software. This particular evaluation is performed on randomly selected electronic data reports and are usually conducted about a week after the close of the reporting period. Unlike the initial MDC evaluation described above, and applied to data for one quarter at a time, this more extensive check has the capacity to evaluate data for more than one quarter. EPA also uses this feature of MDC to ensure that any Bias Adjustment Factor resulting from a Relative Accuracy Test Audit (RATA) is applied correctly. The specifications for the errors identified by this feature of MDC can be reviewed in the Help menu under the MDC hourly module. Sources should use MDC Hourly to check their files prior to submitting them to EPA to eliminate errors when EPA conducts this evaluation.

Additional Electronic Audits

In addition to the evaluations performed by MDC, some additional checks are performed on the electronic data report. These checks include verification of the flow-to-load tests, ensuring the

correct application of missing data substitution procedures, ensuring the correct maximum potential values were used, and verifying the span and range values.

EPA will send feedback results of the MDC hourly evaluation and additional electronic audits described above. The MDC hourly evaluation and feedback from the other electronic audits are sent together following the close of each reporting period and shortly after each resubmittal. Note that a resubmission will be required if any of the evaluations are failed, data are missing or cannot be properly evaluated, or audit results indicate that there is a “significant” impact on the reported emissions (as defined in Section 2. Data Resubmission).

Field Audit

Units identified from the electronic audits as reporting data requiring further review may be targeted for a field audit. These field audits may include activities such as a review of on-site records, CEMS inspections, and quality assurance test observations. When errors or deficiencies are discovered through the field audit program, appropriate corrective action must be taken independently of the electronic data report review process described above.

2. Data Resubmission

As described above in the Data Review section, a source may need to resubmit an electronic data report to correct problems identified in the quarterly reviews. An electronic data report resubmitted to the EPA replaces the previous submission in ETS and will undergo the Data Review processes described above. As a result, please note that the “EPA Accepted” value identified in the initial feedback report may change. Each resubmitted electronic data report must be complete; it must contain all the required data records for emissions, Quality Assurance/Quality Control, and monitoring plan data. Additionally, all resubmitted electronic data reports must include the Designated Representative and/or Authorized Account Representative signature and Certification Statements, included in RTs 900/901 and/or 940/941. If the resubmitted electronic data report passes all of the Data Review processes described above, no further action is required.

Resubmission Procedures and Deadlines

During the 30-day electronic data report submission period following the end of each calendar quarter, a source may revise and resubmit the electronic data reports for that quarter, as necessary, before the electronic data report submission deadline. As a result, most of the electronic data reports will pass all ETS rejection and critical error rejection criteria before the submission deadline. The remaining electronic data reports typically contain problems that cause the EPA to reject them, or they contain other significant inaccuracies identified by the EPA and/or the source. These electronic data reports must be corrected and resubmitted to the EPA. Resubmission deadlines are discussed below.

After the electronic data reporting deadline, a source must first contact the EPA before resubmitting an electronic data report so the EPA can determine whether the resubmission is necessary and prepare ETS to receive the resubmission. If the EPA has rejected the electronic data report, the source DR and/or AAR must correct the electronic data report and resubmit it by the deadline specified in the feedback, or resubmit it according to the supplemental EPA guidance (for example, if the electronic data report was rejected during an audit). If an electronic data report contains other significant errors identified by the EPA and/or the source (as described below), the electronic data report must be resubmitted according to EPA guidance.

If the EPA and/or the source discover an error which impacts the hourly emissions data, the EPA will determine whether the impact is significant and warrants correction of the emissions data through the

resubmission of any or all of the electronic data reports for that calendar year. If a source discovers such an error, the source may voluntarily inform the EPA and request that the EPA allow resubmission of the affected electronic data report(s). If the EPA approves the request, the source will be instructed to resubmit the electronic data report(s).

Final Electronic Data Report Resubmission Deadlines

To finalize the year-to-date/ozone season emissions data as early as possible in anticipation of annual/ozone season allowance reconciliation and compliance determination, the EPA has established the following final electronic data report resubmission deadlines for specified calendar quarters:

1st quarter - Resubmission Deadline: July 1st

2nd quarter - Resubmission Deadline: October 1st

3rd quarter - Resubmission Deadline: December 30th

4th quarter - Resubmission Deadline: March 15th

EPA will work with sources to ensure that the current year's data are accurate, but will not unilaterally change or correct submitted data without providing notice to the affected source. The responsibility to ensure the accuracy of the data submissions remains with the source.

3. Data Dissemination

All electronic data reports received by the EPA are maintained in a central database within ETS. This database is updated when electronic data reports are resubmitted. The EPA regularly extracts data from ETS for public distribution and for ozone season/annual allowance reconciliation and compliance purposes. Reports containing preliminary quarterly and ozone season-to-date/year-to-date summary emissions and related data are released to the public on a quarterly/ozone season basis, approximately 20 days after the end of each calendar quarter. Final ozone season emission data are available approximately five months after the end of the ozone season while final annual emissions data are available approximately five months after the end of the calendar year.

EPA Accepted Data

Here is an example of the "EPA Accepted" values:

4/2003 CUMULATIVE DATA SUMMARY TABLE

ORISPL: Plant Name:

Unit/Stack/Pipe ID:

	Hourly or Daily	Reporting Period or Quarterly	Cumulative Annual or Cumulative Ozone Season	EPA Accepted
SO2	5956.3	5956.3	5956.3	5956.3
CO2	2055774.3	2055774.3	2055774.3	2055774.3
Heat Input	20074913.0	20074913.0	20074913.0	20074913.0

March 2003

Ozone Heat Input			
NOx Rate	0.24	0.24	0.24
NOx Mass			
Ozone NOx Mass			

DEFINITION OF TERMS

Hourly/Daily: Year-to-date value calculated from the hourly/daily records reported for the current calendar year.

Reporting Period/Quarterly: Year-to-date value calculated by summing the current and prior quarter/reporting period totals (not calculated for NO_x rate).

Cumulative: Year-to-date value reported in RT 301 or the Ozone Season value reported in RT 307.

EPA Accepted: The year-to-date or Ozone Season value selected by the EPA as the official value.

Ozone Season: The five month period from May 1 - September 30.

Raw emissions data and preliminary summary emissions reports are available on the emissions page of the Clean Air Markets Division's Web site at:

<http://www.epa.gov/airmarkets/emissions/index.html#prelim>.